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FCC - MAILROOM

Alice Evitt Bandy President

Phil Erli **Executive Vice President**

June 14, 2004

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20544

Re:

In the Matter of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

The Ringgold Telephone Company ("Ringgold") submits this letter and accompanying certification as record that Ringgold is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order"), released on October 3, 2003.

As Ringgold is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, Ringgold is not subject to such requirements at this time. If Ringgold's operations are altered to the extent that Ringgold necessarily becomes a Completing Carrier, Ringgold will fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely.

Michael A. Wallin

to be the present

Regulatory Manager

The Ringgold Telephone Company

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PAY TELEPHONE COMPLETING CARRIER CERTIFICATION OF THE RINGGOLD TELEPHONE COMPANY

- 1. My name is Mike Wallin. I currently serve as the Regulatory Manager of Ringgold Telephone Company, a provider of local exchange telecommunications services as an Independent Local Exchange Carrier in the state of Georgia. In this capacity, I have become familiar with the network operations of Ringgold Telephone Company and its practices associated with the completion of calls originated from Pay Telephones.
- 2. Ringgold Telephone Company is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
- 3. Ringgold Telephone Company's provision of operator services for the completion of local calls from pay telephones is handled by AT&T through a contractual arrangement.
- 4. Ringgold Telephone Company has confirmed with Bellsouth that any calls processed by Bellsouth are included in the respective call tracking systems and compensation remittance process of AT&T.
- 5. Ringgold Telephone Company contracts with Bellsouth for completion of calls originated by access code.
- 6. Ringgold Telephone Company does not currently provide a subscriber toll-free service. With respect to subscriber toll-free payphone calls, Ringgold Telephone Company contracts with DEF for completion subscriber toll-free calls.

7. In consideration of the aforementioned facts, ABC is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on *DATE*.

NAME

Regulatory Manager

Ringgold Telephone Company

6203 Ala Hwy

Ringgold, GA 30736

The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).